

# AMERICAN BANK

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February 22, 2006

Financial Crimes Enforcement Network  
P. O. Box 39  
Vienna, VA 22183

**Attention: 1506-0001, Revised Suspicious Activity Report by Depository Institutions**

To whom it may concern,

Upon reviewing the proposed changes to the depository institution Suspicious Activity Report, we have the following comments:

**Movement of the "Relationship of Subject" (currently Part II, data item 30) to the new Part III.**

Movement of this data element away from the "Subject" information section will be ineffective in the case where there are multiple Subjects, each potentially with their own relationship to the depository institution. For instance, there may be instances where one Subject is an insider and another Subject is a customer. Under the proposed change, there will be no way to designate which Subject is the insider and which is the customer.

**Movement of Financial Soundness information (currently data item 38) to the narrative section.**

I am of strong belief that movement of this data element into the narrative will result in a large portion of SARs not addressing the information simply because it will be overlooked. In short, if it is important enough to be recorded on all SARs, it should be included as a regular checkbox data element as it had been in the past. The logical placement for this information would be in new Part II or new Part III.

**Movement of the Law Enforcement Contact information (currently data items 40-44) to the narrative section.**

As above, I am of strong belief that movement of this data element into the narrative will result in a large portion of SARs not addressing the information simply because it will be

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overlooked. In short, if it is important enough to be recorded on all SARs, it should be included as a regular data element as it had been in the past. The logical placement for this information would be in new Part III or new Part IV.

Thank you for the opportunity to express my opinions on the proposed changes. Please feel free to contact me directly for clarification. I can be reached during normal business hours at (651) 643-8443 or anytime at mhausauer@americanbankmn.com.

Respectfully submitted by,



Mark E. Hausauer, CAMS  
SVP Risk Management & Compliance

cc: FRB Board of Governors